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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,  
Plaintiff

v.

SHANNON BLAYLOCK and  
TAWAKONI SEATON

Defendants

No.07-0454 PJH

**JOINT PROPOSED VOIR DIRE  
QUESTIONS**

Pre-Trial Conference: August 27, 2008  
Time: 1:30 p.m.

Trial Date: September 15, 2008  
Time: 8:30 a.m.

Pursuant to the June 28, 2008 Order of Pretrial Preparation For Criminal Jury Trial (*ECF Docket No. 77*), the parties hereby submit the following Joint Proposed Voir Dire questions .

The parties reserve the right to request such additional questions as may become necessary from rulings on motions in limine or upon determination of the theory of the defense.

Date: August 13, 2008

Respectfully submitted,

JOSEPH P. RUSSONIELLO  
United States Attorney

/s/  
\_\_\_\_\_  
DENISE MARIE BARTON  
Assistant United States Attorney

SHANNON BLAYLOCK  
Defendant

/s/  
\_\_\_\_\_  
Michael Stepanian  
Attorney for Defendant Shannon Blaylock

1 1. Do you know anything at all about the facts of this case?

2  
3 2. Have you heard anything about this case since you arrived at the  
4 courthouse?

5  
6 3. Do you access social networking websites, including Facebook or Myspace.com, or  
7 Craigslist on the internet? If so, for what purpose or purposes?

8  
9 4. The defendant in this case is charged with offenses involving prostitution of a minor, a  
10 person under the age of eighteen. Does any member of the panel have beliefs about prostitution  
11 and/or sexual abuse of a minor that would prevent him or her from rendering a fair and impartial  
12 verdict based solely on the evidence in this case?

13  
14 5. Defendant Shannon Blaylock is charged with sex trafficking of a minor and conspiracy to  
15 engage in sex trafficking of a minor. Is there anything about the nature of these charges that  
16 would make it difficult for you to be fair and impartial as a judge of the facts?

17  
18 6. It is expected that during the course of this trial, you may hear the testimony of a eighteen  
19 year old female about events that occurred in 2007, when she was seventeen years old. Is there  
20 anyone here who would not give a young person's testimony the same consideration given to any  
21 other witness? Is there anyone here that believes young people tell lies about important matters  
22 more or less often than adult witnesses?

23  
24 7. In this case, there will be testimony and evidence about prostitution of adult females. Are  
25 there any members of the jury panel who believe that prostitution of adults should be legalized?

26  
27 8. Can you set aside any bias or prejudice you may have against Defendant Shannon  
28 Blaylock because he engaged in sex trafficking of adult women?

1 9. In this case, there will be testimony and evidence about prostitution of minor females. Are  
2 there any members of the jury panel who believe that prostitution of minors should be legalized?

3  
4 10. Do any of you believe that if a female, either over or under the age of 18, decides to work  
5 as a prostitution, that should be "her business" and not something that the criminal justice system  
6 should get involved in?

7  
8 11. It is expected that during the course of this trial, some of the witnesses will testify that they  
9 had been involved in prostitution, in other words taking money for sex. Is there anyone who  
10 would not give that person's testimony the same consideration given to any other witness?

11  
12 12. In this case, the evidence is likely to include explicit references to male and female  
13 genitalia and to explicit sexual acts. Is here anyone who believes that he or she would be so  
14 embarrassed, uncomfortable, or offended by such evidence that he or she could not listen to it and  
15 give it the same consideration as any other evidence in the case?

16  
17 13. Has your family or the family of a close friend or relative been affected by prostitution?

18  
19 14. Have you or any member of your family or a close friend ever been accused of  
20 sexual abuse of minor?

21  
22 15. Have you or any member of your family or a close friend made, or known anyone  
23 who has made, a report of sexual assault or sexual abuse of a minor?

24  
25 16. Do you know of any reason why you may be prejudiced for or against  
26 the government, for or against any witness, or for or against any defendant, because of  
27 the nature of the charges or otherwise?

1 17. In order for the Government to meet its burden of proving defendant's guilt beyond a  
2 reasonable doubt, the Government must prove the defendant had knowledge of the age of a female  
3 identified as "V.S." and not simply that he should have known. Would you have any problem  
4 holding the government to this burden?